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ATTORNEY FOR DEBTOR

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

|                           |   |                                |
|---------------------------|---|--------------------------------|
| <b>IN RE:</b>             | § |                                |
|                           | § |                                |
| <b>NICHOLAS PAUL KARR</b> | § | <b>CASE NO. 24-34042-SWE-7</b> |
|                           | § |                                |
| <b>Debtors</b>            | § | <b>CHAPTER 7</b>               |
|                           | § |                                |

**MOTION FOR EXTENSION OF TIME TO FILE CHAPTER 13 SCHEDULES,  
STATEMENT OF AFFAIRS AND CHAPTER 13 PLAN**

TO THE HONORABLE JUDGE OF THIS COURT:

COMES NOW Debtor, Nicholas Paul Karr and requests an order extending the deadlines to file Chapter 13 Schedules, Statement of Affairs, Chapter 13 Plan, and new case deficiencies pursuant to L.B.R. 1007.1(a) and F.R.B.P 3015 and would show the Court as follows:

1. This Court has jurisdiction over this matter pursuant to 11 U.S.C. §105 and 28 U.S.C. §1334. This matter constitutes a core proceeding pursuant to 28 U.S.C. §157(b).
2. Debtor filed his petition in bankruptcy under Chapter 24-34042-SWE-7 on 12/12/2024
3. Chapter 13 Schedules, Statement of Affairs, and Chapter 13 Plan are due 12/26/2024.
4. The § 341 Creditor Meeting is set for 01/22/2025.
5. Debtor will need an additional fourteen (14) days, until 1/9/2025, to prepare the Schedules, Statement of Affairs, Chapter 13 Plan, and new case deficiencies because of the need to gather information. Debtor's other obligations have resulted in a delay in providing his

Attorney information necessary to produce accurate Chapter13 Schedules, Statement of Affairs, Chapter 13 Plan, and new case deficiencies.

WHEREFORE, PREMISES CONSIDERED, Debtor **Nicholas Karr** respectfully requests the Court to grant an extension of fourteen (14) days, until 1/9/2025, for Debtor to file his/her/their Chapter 13 Schedules, Statement of Affairs, Chapter 13 Plan, and new case deficiencies and for such other relief the Court may grant.

Dated: December 23, 2024

Respectfully Submitted,

LEE LAW FIRM, PLLC

By: /s/Christopher M Lee

Christopher M. Lee

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## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on December 23, 2024 a true and correct copy of the foregoing was served on all parties in interest below and on the attached mailing matrix.

### **DEBTOR:**

Nicholas Karr  
6701 Hursey St. Apt A  
Dallas, TX 75205

### **STANDING CHAPTER 13 TRUSTEE:**

Jeffrey H. Mims  
Founders Square, Suite 560  
900 Jackson Street  
Dallas, TX 75202

### **U.S. TRUSTEE**

Rm. 976  
1100 Commerce Street  
Dallas, TX 75242

By: /s/ Christopher M. Lee

Christopher M. Lee  
State Bar No. 24041319

ATTORNEY FOR DEBTOR